



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

March 14, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Crystal Lake Bank & Trust Co., N.A.
Charter Number: 23574

70 North Williams Street
Crystal Lake, IL 60014

Office of the Comptroller of the Currency

1700 E. Golf Road, Suite 800
Schaumburg, IL 60173

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

OVERALL CRA RATING 2

DEFINITIONS AND COMMON ABBREVIATIONS 3

DESCRIPTION OF INSTITUTION7

SCOPE OF THE EVALUATION8

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW9

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS9

LENDING TEST9

INVESTMENT TEST13

SERVICE TEST14

APPENDIX A: SCOPE OF EXAMINATIONA-1

APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREASB-1

APPENDIX C: TABLES OF PERFORMANCE DATAC-1

Overall CRA Rating

Institution’s CRA Rating: This institution is rated “**Outstanding.**”

The following table indicates the performance level of **Crystal Lake Bank & Trust Company, N.A.** with respect to the lending, investment, and service tests:

Performance Levels	Crystal Lake Bank & Trust, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- A majority of small loans to businesses and consumer loans are originated within the bank’s AA;
- The borrower distribution of the bank’s mortgage loans, combined with the mortgage loans of affiliate Wintrust Mortgage Company, is excellent;
- The borrower distribution of consumer loans is excellent and the borrower distribution of small business loans is good;
- Community development lending as well as the bank’s offering of flexible lending products had a positive impact on the lending test rating and shows responsiveness to the identified credit needs in the AA;
- The bank provides an excellent level of community development investments and a good level community development services in its AA; and
- Retail services are accessible to individuals of different income levels in the AA.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

Crystal Lake Bank & Trust Company, N.A. (CLBT) is a full-service intrastate bank headquartered in Crystal Lake, IL, which is at the northwest corner of the Chicago- Naperville-Joliet MD. As of 12/31/10 total assets were \$692 million and Tier 1 capital was \$75 million. The bank is wholly-owned by Wintrust Financial Corporation, with assets of just over \$14 billion, headquartered in Lake Forest, IL. Wintrust Financial Corporation is very active in the financial services industry, and owns fifteen banks, a mortgage company, a trust company, an investment company, and an information technology company. Affiliate activity was considered in determining the bank's performance during this examination. HMDA-LAR information was extracted from affiliate Wintrust Mortgage Company's loan portfolio.

CLBT has five offices and two separate drive-up facilities located within its assessment area (AA). All of these offices and drive-up facilities have hours tailored to meet the needs of the local community. Two of the bank's branch locations were added since the last CRA examination. CLBT added a full service branch, Algonquin Bank & Trust, in 2006 and in 2008 CLBT purchased the McHenry branch of an affiliate, State Bank of the Lakes (now known as McHenry Bank & Trust East) which is also a full service branch. CLBT's main office in downtown Crystal Lake does not have a drive-up facility, but there are two separate drive-up facilities located within several blocks of this office. The offices in McHenry, Cary, and Algonquin have attached drive-up facilities in addition to small bank lobbies. There are eight Automated Teller Machines (ATMs), one each at four branch locations, two at one branch location, and at the two drive-up facilities. All of the CLBT offices and drive-up facilities are located in upper-income census tracts with the exception of the offices located in McHenry, which are situated in middle-income census tracts.

CLBT offers a variety of consumer, real estate, and commercial loan products to its community. As of 12/31/10 the loan portfolio totals \$494 million, and represents 71% of the bank's total assets. The bank's lending focus is commercial lending which, based on the dollar amount, represents 69% of the total loan portfolio. The vast majority of the bank's 1-4 family mortgage loan applications are forwarded to affiliate organization Wintrust Mortgage Company for processing and origination. In-house mortgage loans represent 17% of the total loan portfolio and consumer loans make up the remaining 14%. A breakdown of the residential mortgage loans as of 12/31/10 shows that approximately 34% are closed-end mortgage loans, 34% are home equity lines of credit, 28% are multi-family mortgages, and 4% are construction loans.

Composition of the CLBT's loan portfolio as of 12/31/10:

Loan Type	Dollar Amount of Loans (Millions)	Percentage of Loan Portfolio
Commercial/Farm Loans	\$339	69%
Residential Real Estate Loans	\$87	17%
Other Consumer Loans	\$69	14%
Total	\$494	100%

CLBT has the resources and financial strength to meet the credit needs of its community. There are no legal or financial factors impeding the bank's ability to help meet the credit needs in its AA. The bank received a Satisfactory rating at the last CRA examination dated 2/1/06.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Community Reinvestment Act (CRA) examination covers the bank's performance from 10/01/05 through 2/28/11. The last CRA examination was performed using Intermediate Small Bank procedures and the bank was rated "satisfactory". The bank has elected to be examined using the Large Bank examination procedures. The review period for all bank activity except community development activity is 1/1/08 through 12/31/10. Community Development Activity from 10/01/05 through 2/28/11 will be considered.

Products reviewed during this examination include small business loans reported on the CRA LAR, residential mortgage loans reported on the HMDA LAR, and the following four consumer loan types: home equity, motor vehicle, secured, and unsecured. In addition home mortgage loans reported by the bank's affiliate, Wintrust Mortgage Company on its HMDA LARs for years 2008-2010 and originated within the bank's AA will also be considered in the bank's performance.

Data Integrity

A separate data integrity examination of the bank's HMDA, small business, and HELOC lending was performed in 2010 and the data was found to be reliable. Consumer loans, other than HELOC which are recorded by the bank as consumer loans, were not included in the data integrity examination as the bank had not decided at that time that they wished to include them in the CRA examination. At the start of this examination we reviewed 60 consumer loans originated in 2008, 2009, and 2010. We found the bank's consumer loan information to be reliable. Community Development activity was reviewed both during the original data integrity examination and this examination. Those loans, investments and services that met regulatory criteria for community development activities were included in the analysis of bank performance during this CRA examination.

Selection of Areas for Full-Scope Review

The bank has only one AA, which will receive a full scope review.

Ratings

The bank's overall rating is based on a full-scope review. We placed more emphasis on the bank's small business lending than on home mortgage lending in performing the lending test. Based on analysis of new loan reports from 1/1/08 through 12/31/10, commercial loan originations represent 59% of the total loans originated during the evaluation period and are a primary credit need of the AA. When analyzing mortgage loan activity more weight is given to lending to moderate-income borrowers than low-income borrowers as demographics show a larger portion of the families in the AA fall within the moderate-income category. Due to the very low levels of activity for home improvement loans (nine during the review period) and small farm loans (three), they are not being included in our analysis of lending activity.

Other

During our examination, we held discussions with two community contacts within the bank's AA. One contact stated that although the majority of McHenry County is composed of individuals and families who are middle- and upper-income, there is a growing population of individuals who come into the county to work but cannot find affordable housing through rental properties or home ownership.

The other contact identified numerous non-profit organizations within McHenry County that provide assistance to low- and moderate-income families, illustrating that many opportunities exist for participation by local financial institutions.

Another need within the AA that was identified through analysis of the demographics of the AA is for lending to small businesses as a majority of the businesses within the AA meet the criteria of small businesses.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the lending test is rated "**Outstanding.**" Based on a full-scope review, the bank's performance in its defined AA is excellent.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

Lending activity in the bank's AA is excellent and is reflective of the credit needs within the bank's AA. The bank's lending focus is primarily commercial lending, which, as of 12/31/10, represents 69% of the bank's loan portfolio. The bank also requested that consumer loans be considered in this CRA evaluation. Consumer loan types that the bank has collected data on and that will be included in our analysis include HELOCs, vehicle loans, secured, and unsecured consumer loans. Under corporate guidance the bank has elected since 2005 to refer the vast majority of its mortgage loan applications to its affiliate, Wintrust Mortgage Company. During this examination we will consider those mortgages originated by Wintrust Mortgage Company that are within the bank's AA in addition to those originated directly by the bank.

The most recent FDIC deposit market share report shows that CLBT ranks third among 31 financial institutions with branches in McHenry County, with a market share of 9%.

Distribution of Loans by Income Level of the Geography

A geographic distribution analysis would not be meaningful as the bank's AA contains no low- or moderate-income geographies.

Lending Gap Analysis

Mortgage loan, small business, and consumer loan origination activity within the bank's designated AA during the review period was mapped on CRAWIZ. No gaps in lending activity throughout the AA were noted.

Inside/Outside Ratio

- This analysis included only those loans originated or purchased by the bank and did not include affiliate lending. It showed that a majority (65% by number and 51% by dollar amount) of the total originations and purchases were within the AA. By product type, small business loans originated within the AA were 64% by number and 52% by dollar amount; HMDA loan originations within the AA were 35% by number and 30% by dollar amount; and consumer loans within the AA were 71% by number and 67% by dollar amount. Although the volume of mortgage lending originated directly by the bank is low and a majority of the mortgage loans originated by the bank are not in the AA, mortgage loan needs of individuals in the AA are being met through referrals to the bank's affiliate, Wintrust Mortgage Company.

Distribution of Loans by Income Level of the Borrower

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small business loans originated by CLBT in its AA is good. During the review period CLBT's small business loan originations within its AA equaled 55%, which is below the demographics which show that 81% of those businesses within the AA are small businesses. It should be noted that the demographic information shows that 14% of the businesses had no revenue information available while 100% of the bank's loans were classified. It should also be noted that 82% of the bank's small business loans are in amounts of \$250,000 or less and 56% are in amounts of \$100,000 or less.

A market share report of those financial institutions that originated small business loans within the bank's AA shows that CLBT ranks 9th among the top 71 lenders with a market share of 2.46% based on number of loans and a market share of 10.21% and ranking of 2nd based on dollars. A second market share report of small business lending within the AA to businesses with revenues of \$1 million or less shows the bank's ranking remains 9th of 71 lenders; however, market share increases to 5% based on number of loans, and based on dollar amounts the bank's ranking remains at 2nd and market share increases to 16%. Both the bank's market share and ranking by dollar amount exceed its deposit market share. All but one of the financial institutions that had higher market shares than the bank, based on number of loans originated, were regional or nation-wide, and/or credit card banks.

Home Mortgage Loans

Refer to Tables 8 and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. This analysis includes loans originated by both the bank and its affiliate Wintrust Mortgage Company.

The overall distribution of mortgage loans originated by CLBT within its AA is excellent.

The borrower distribution for home purchase loans is excellent. Home purchase originations to low-income borrowers (15%) exceed the percentage of that to low-income families (9%) and the percentage of home purchase originations to moderate-income borrowers (16%) exceeds the percentage of that to moderate-income families (13%). The bank's performance in lending to low-income borrowers is even further heightened by the fact that 3% of the families in the AA live below the poverty level. The most recent combined market share of the bank and Wintrust Mortgage Company for home purchase loans is 4%. The combined market share for home purchase loans to low-income borrowers is 6% and the combined market share of home purchase loans to moderate-income borrowers is 2.5%. Those financial institutions that had higher market shares of lending to low- and moderate-income borrowers were primarily large regional or nation-wide financial institutions or mortgage companies.

The borrower distribution for home refinances is excellent. The percentage of combined home refinance originations by the bank and Wintrust Mortgage Company (16%) exceeds the percentage of moderate-income families in the bank's AA. The percentage of home refinance originations to low-income borrowers (4%) is below the percentage of that to low-income families (9%); however, it is adequate. It should be noted that review of the peer group's distribution of refinancing loans among borrowers of different income levels within the bank's AA shows that only 4% of the peer group's refinances were to low-income borrowers as well. The most recent combined CLBT/Wintrust Mortgage Company market share for refinance loans in the AA is 2%. The combined market share for refinances to low- and moderate-income borrowers is less than the overall market share for refinancings.

Consumer Loans

Refer to Table 13 of appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans originated by CLBT is excellent. The bank's level of consumer lending to low-income borrowers (14%) exceeds the percentage of low-income households in the AA (11%) and lending to moderate-income borrowers (15%) exceeds the percentage of moderate-income households (13%).

Community Development Lending

Refer to Table 1, Lending Volume, in Appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans.

Community development lending had a positive impact on the Lending Test. CLBT originated 27 loans to community development organizations and/or for community development purposes during the review period totaling \$8.68 million, which represents 12% of Tier 1 capital.

Detail on these loans includes:

- One loan totaling \$6.67 million was originated to an entity that provides affordable housing in McHenry.
- A non-profit organization that provides services for the homeless received loans totaling \$767 thousand.
- An organization that provides services to low- and moderate-income individuals affected by sexual and physical abuse received loans in the amount of \$100 thousand.
- Three community service organizations that provide services to veterans and disabled individuals who are primarily low- and moderate-income were granted loans in the amount of \$981 thousand.
- The McHenry County Economic Development Corporation received \$150 thousand in working capital funds. Documentation in the loan file supports that these funds will be used for job creation in McHenry County, of which the majority will support low-income individuals.

In addition to these community development loans granted inside the bank's AA, the bank granted an additional 24 multi-family loans totaling \$9.13 million secured by properties located primarily in the city of Chicago that qualify as low/moderate income housing. This dollar amount represents 12% of Tier 1 capital. Due to the strong level of performance within the AA we are giving positive consideration to these activities that have occurred in a broader regional area surrounding the bank's AA.

Product Innovation and Flexibility

Product flexibility had a positive impact on the Lending Test conclusion. CLBT offers a number of flexible products.

- The bank participates in the State of Illinois' Finally Home Program targeted to low- and moderate-income borrowers who may be unable to obtain a conventional mortgage due to bruised credit, high debt, or other factors.
- The bank has introduced the No Hassle Small Business loan product in amounts ranging from \$5,000 to \$35,000, targeting very small businesses with fewer than ten employees. Both revolving line of credit and term loan options are available under this program.
- CLBT participates in SBA lending programs, including the SomerCor 504 and 7A products, offering a broader spectrum of options to small businesses.

- CLBT has two credit products during the review period which as of 2010 are now offered only to attendees of the Money Smart program, developed by the FDIC: a credit-rebuilding loan called the Borrow-N-Save loan, targeted to low- or moderate-income individuals and the Everyday Loan. Borrow-N-Save loan proceeds are used to purchase a CD, which secures the loan until maturity, giving individuals the opportunity establish a credit history and accumulate savings. The Everyday Loan is a short term designed to consolidate debt into a manageable payment, with more flexible underwriting criteria.

Special lending program activity since the last examination includes:

Program	Number Loans	Total \$ amount
SBA 504 Program	5	\$ 5,376,140
SBA - 7A Program	6	\$ 4,613,400
No Hassle Sm Biz Loan	2	\$ 70,000
Everyday Loans	11	\$ 19,100
Borrow N Save Loans	6	\$ 5,200
Small Business Micro Loans	3	\$ 76,360
Totals	33	\$10,160,210

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the investment test is rated **“Outstanding.”**

Refer to Table 14 of Appendix C for the facts and data used to evaluate the bank’s level of qualified investments.

Based on a full-scope review, the bank’s performance is excellent. CLBT made qualified investments totaling \$5.02 million during the review period . Additionally, the present value of prior period investments totals \$1.1 million. The bank also provided grants to 45 different organizations with a community development purpose within the AA totaling \$105 thousand. In total, the bank’s current and prior period investments as well as grants total \$6.3 million, which represents 8% of Tier 1 capital.

Qualified investments included:

- Investment in eight mortgage backed securities totaling \$2.1 million. That portion of the pool of mortgages making up each security purchased by the bank represents one or more loans to individuals with incomes of 80% or less of the median MSA income.
- A \$1.1 million investment in an SBA Loan Fund LLC, which has been designated as a CDFI Fund certified Community Development Entity. Funds from the bank’s investment were allocated to a specific SBA guaranteed Community Development Loan originated within the bank’s AA.
- The bank invested a total of \$500 thousand in two securities purchased from a Regional CDFI that provides funding for infrastructure needs of nonprofit organizations that work with low- or moderate-income individuals.

- An additional \$1.1 million in investments have been made in a national CRA qualified investment fund. The Bank's investment funds have been allocated to loans to low- or moderate-income borrowers originated specifically in the bank's AA.

SERVICE TEST

The bank's performance under the Service Test is rated "**High Satisfactory.**" Based on a full-scope review, the bank's performance is good.

Retail Banking Services

Refer to Table 15 of Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

CLBT's delivery systems are accessible to individuals of different income levels within the bank's AA. There are no low- or moderate-income geographies in CLBT's AA; however, there are low- and moderate-income individuals/families that reside within the middle- and upper-income geographies in the AA.

CLBT currently operates five full-service branches. Since the prior CRA examination, the bank has added a branch in McHenry, Illinois and one in Algonquin, Illinois. No office locations have been closed during the review period. Lobby hours and services provide good accessibility for all bank customers. Hours and services are standard among all locations.

There are seven Automated Teller Machines (ATMs): one at each branch and at each of the two drive-up facilities. In addition, CLBT has formed an alliance with MoneyPass and SUM ATM networks allowing the bank to offer an additional 79 ATM locations that do not charge bank customers a surcharge. Other delivery systems offered by the bank include 24/7 telephone and internet banking, including bill payment.

Community Development Services

CLBT's performance in providing community development services in the AA is good. Several senior bank officers and employees of CLBT serve on the Boards of Directors or as officers of 27 different community development organizations that serve the bank's AA. Community Development activities include:

- President Thorpe is Chairman of the McHenry County Economic Development Corporation (MCEDC). The MCEDC works to promote the economic health of McHenry County through the retention, expansion, and attraction of commerce and industry and to aid in the creation of primary jobs through assistance and attraction. The MCEDC sponsors the McHenry County Loan Fund

(MCLF), which is a government funded program that provides funds in combination with other sources of funding to get new businesses off the ground. The bank has played a major role in the co-sponsorship of several loans originated by the MCLF.

- Bank Compliance Officer Raul Rodriguez is a member of the HUD-sponsored McHenry County Continuum of Care (MCCOC), which is a network of agencies that assist homeless individuals and families by providing emergency, transitional, and permanent housing, as well as supportive services. HUD, as well as the Illinois Department of Human Services and the Illinois Department of Commerce, relies on the MCCOC to identify gaps in homeless housing and services and to determine the appropriate projects and programs for McHenry County.
- In 4Q10 the bank began offering the FDIC's Money Smart financial literacy programs, partnering with local non-profit agencies. Two credit-building loan products are offered to all participants who complete the Money Smart program as well as a demand deposit and savings account with higher than normal interest rates and other features not generally offered.
- Residential lender Brent Burns, acting on behalf of Wintrust Mortgage Company and CLBT, is a member of the McHenry County Housing Commission and heads the Education Committee.
- The bank organized a luncheon for the Executive Directors of CRA qualified organizations to discuss banking opportunities for the organizations, their clients, and their employees. The guest speaker was from IFF, a CDFI formed in 1988 to provide nonprofit corporations serving low-income communities with affordable financing for capital projects.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/2008 to 12/31/2010 Investment and Service Tests and CD Loans: 10/01/2005 to 02/28/2011	
Financial Institution		Products Reviewed
Crystal Lake Bank & Trust Company, N.A. (CLBT)		Commercial Loans, Residential Mortgage Loans, Consumer Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>[Instructions: Provide only if affiliate products are reviewed.]</i> Wintrust Mortgage Company	Subsidiary of affiliate Barrington Bank & Trust Co. N.A. also owned by Wintrust Financial Corporation	Residential Mortgage Loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Illinois Chicago-Naperville-Joliet MD	Full-Scope	

Appendix B: Market Profile for Full-Scope Area

Demographic Information for Full-Scope Area: (Crystal Lake B&T AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	0.00	0.00	40.63	59.38	0.00
Population by Geography	181,176	0.00	0.00	34.92	65.08	0.00
Owner-Occupied Housing by Geography	54,486	0.00	0.00	34.52	65.48	0.00
Businesses by Geography	11,795	0.00	0.00	36.13	63.87	0.00
Farms by Geography	318	0.00	0.00	42.45	57.55	0.00
Family Distribution by Income Level	48,965	8.59	13.40	24.72	53.29	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	10,768	0.00	0.00	45.98	54.02	0.00
Median Family Income	= \$60,166					
HUD Adjusted Median Family Income for 2010	= \$74,600					
Households Below the Poverty Level	=3%					
				Median Housing Value	= \$172,817	
				Unemployment Rate	= 1.75%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census, and 2010 HUD updated MFI.

DESCRIPTION OF ASSESSMENT AREA

CLBT is headquartered in Crystal Lake, Illinois. Crystal Lake is within the Chicago/Naperville/Joliet MD 16974. The bank's defined AA consists of 32 of the 47 geographies in McHenry County, Illinois. There are no low- or moderate-income geographies in the AA (or the county), 13 middle-income geographies, and 19 upper-income geographies within the AA. CLBT's AA meets the requirements of the Community Reinvestment Act, and does not arbitrarily exclude low- or moderate-income areas.

As of 6/30/10, CLBT's deposits total \$545 million and are all within McHenry County. Based on FDIC deposit market share data on that date, CLBT ranks 3rd out of 31 banks with deposits in McHenry County, with a market share of 9%. During the review period, a majority (65% by number and 51% by dollar amount) of the total originations and purchases were within the AA. By product type, small business loans originated within the AA were 64% by number and 52% by dollar amount; HMDA loan originations within the AA were 35% by number and 30% by dollar amount; and consumer loans within the AA were 71% by number and 67% by dollar amount.

The updated Housing and Urban Development (HUD) 2010 median family income for the AA is \$74,600. A breakdown of family income levels within the AA shows that 8.59% are low-income, 13.40% are moderate-income, 24.27% are middle-income, and 53.29% are upper-income. In addition, 3% of the households within the AA have incomes below the poverty level.

Of the 64,171 housing units in the AA, 59,169 (92.21%) are 1-4 family housing units (of which 83% are owner occupied), 7% are multi-family units, and 1% are mobile homes. The median housing value within the AA based on 2010 census data is \$172,817.

Unemployment within the AA as of 2010 is 2.43%, which is much lower than unemployment rates for the State of Illinois and the nation, which both stand at 9.6%.

Much of McHenry County's economy centers around manufacturing, metalworking, media development and printing, transportation equipment, agriculture, healthcare, education, retail, food production, distribution, and technology. The major employment centers can be found in Crystal Lake, Algonquin, Huntley, McHenry, and Woodstock.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans

originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each M

Table 1. Lending Volume

LENDING VOLUME		Geography: CRYSTAL LAKE B&T AA						Evaluation Period: January 1, 2008 TO December 31, 2010				
MA/Assessment Area: Chicago/Naperville/Joliet MD	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Crystal Lake B&T AA	100.0	506	109,536	482	82,153	0	0	27	8,681	1010	199,190	100.00
Limited Review:												

* Loan Data as of December 31, 2010. Rated area refers to either the state or multi-state MA rating area.
 ** The evaluation period for Community Development Loans is October 1, 2005 to February 28, 2011.
 *** Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: CRYSTAL LAKE B&T AA								Evaluation Period: January 1, 2008 TO December 31, 2010				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA *	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Crystal Lake B&T AA	100.0	368	30,858	0	0	248	24,514	23	322	0	0	63	5,850	100.0

Limited Review:

* Loan Data as of December 31, 2010. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is From January 1, 2008 to December 31, 2010.

*** Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: CRYSTAL LAKE B&T AA		Evaluation Period: January 1, 2008 TO December 31, 2010	
MA/Assessment Area:	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
Crystal Lake B&T AA	34	172	0	0	
Limited Review:					

(*)The evaluation period for Optional Product Line(s) is from January 1, 2008 to December 31, 2010.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE														Geography: CRYSTAL LAKE B&T AA				Evaluation Period: January 1, 2008 TO December 31, 2010				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*											
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp							
Full Review:																						
Limited Review:																						

* Based on 2009 Peer Mortgage Data.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: CRYSTAL LAKE B&T AA				Evaluation Period: January 1, 2008 TO December 31, 2010									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Limited Review:															

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: CRYSTAL LAKE B&T AA					Evaluation Period: January 1, 2008 TO December 31, 2010				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp									
Full Review:																								
Limited Review:																								

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.
 *** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CRYSTAL LAKE B&T AA						Evaluation Period: January 1, 2008 to December 31, 2010							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Limited Review:															

* Based on 2009 Peer Mortgage Data

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: CRYSTAL LAKE B&T AA					Evaluation Period: January 1, 2008 TO December 31, 2010																																																																																																																																																																																																																																																																																																																																							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																																																																																																																																																																																																																																																																																																																																																
	#	% of Total*	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp																																																																																																																																																																																																																																																																																																																																												
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* Based on 2009] Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet 2010).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: CRYSTAL LAKE B&T AA				Evaluation Period: January 1, 2008 TO December 31, 2010			
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*								
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp				
Full Review:																			
Limited Review:																			

* Based on 2009 Peer Small Business Data: US.
 ** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
 *** Source Data - Dun and Bradstreet 2010.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: CRYSTAL LAKE B&T AA				Evaluation Period: January 1, 2008 TO December 31, 2010					Market Share [*]				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total [*]	% Families ^{***}	% BANK Loans ^{***}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Crystal Lake B&T AA	147	100.0	8.59	15.00	13.40	16.43	24.72	33.57	53.29	35.00	2.56	4.30	1.78			

Limited Review:

^{*} Based on 2009 Peer Mortgage Data (USPR)
^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
^{***} Percentage of Families is based on the 2000 Census information.
^{****} As a percentage of loans with borrower income information available. No information is available for 4.8% of loans originated and purchased by the bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CRYSTAL LAKE B&T AA								Evaluation Period: January 1, 2008 TO December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families ***	% BANK Loans ***	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Crystal Lake B&T AA	0	0.00	8.59	0.00	13.40	0.00	24.72	0.00	53.29	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															

* Based on 2009 Peer Mortgage Data
 ** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
 *** Percentage of Families is based on the 2000 Census information.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: CRYSTAL LAKE B&T AA			Evaluation Period: January 1, 2008 TO December 31, 2010											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*																		
	#	% of Total**	% Families ***	% BANK Loans ***	% Families ****	% BANK Loans ****	% Families ****	% BANK Loans ****	% Families ****	% BANK Loans ****	Overall	Low	Mod	Mid	Upp														
Full Review:																													
Crystal Lake B&T AA	351	100.0	8.59	4.05	13.40	15.58	24.72	29.50	53.29	50.93	1.48	.50	1.43																

*Based on 2009 Peer Mortgage Data
 ** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.
 *** Percentage of Families is based on the 2000 Census information.
 **** As a percentage of loans with borrower income available, No information is available for 9.3% of loans originated and purchased by bank.
 Data shown includes only One to Four-family and manufactured housing (property type 1 or 2)

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Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: CRYSTAL LAKE B&T AA			Evaluation Period: January 1, 2008 TO December 31, 2010		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses**	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less	
Full Review:										
Crystal Lake B&T AA	482	100.0	81.13	55.19	56.22	25.93	17.84	3.49	5.27	
Limited Review:										

* Based on 2009 Peer Small Business Data: US. And P.R.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - Year 2010).

**** Small loans to businesses of revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.21% of small loans to businesses originated and purchased by the bank.

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Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: CRYSTAL LAKE B&T AA		Evaluation Period: January 1, 2008 TO December 31, 2010		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Limited Review:									

* Based on 2009 Peer Small Business Data: US.
 ** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
 *** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2010).

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Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: CRYSTAL LAKE B&T AA																			Evaluation Period: January 1, 2008 TO December 31, 2010																		
MA/Assessment Area:	Geographic Distribution										Borrower Distribution																																													
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers																																							
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans																																						
Full Review:																																																								
Crystal Lake B&T AA	368	100.0	0.00	0.00	0.00	0.00	36.76	51.63	63.24	48.37	10.86	13.86	12.65	14.67	19.90	22.83	56.69	45.65																																						
Limited Review:																																																								

* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.
 ** Percentage of Households is based on the 2000 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
				Geography: CRYSTAL LAKE B&T AA			Evaluation Period: October 1, 2005 TO February 28, 2011		
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Crystal Lake B&T AA	5	1,131	11	5,024	16	6,260	100.0		
Limited Review:									

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: CRYSTAL LK B&T AA Evaluation Period: January 1, 2008 TO December 31, 2010																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Crystal Lake B&T AA	100.0	5	100.0	0	0	40	60	2	0	0	0	1	1	0.00	0.00	34.92	65.08
Limited Review:																	